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13 UNITED STATES DISTRICT COURT

14 NORTHERN DISTRICT OF CALIFORNIA

15 SAN FRANCISCO DIVISION

16 UNITED STATES OF AMERICA,) NO. 21-CR-00264
17 Plaintiff,)
18 v.) STIPULATION TO EXCLUDE TIME FROM
19 BROGDAN VADUVA,) MARCH 8, 2022 TO APRIL 18, 2022 AND
20 Defendant.) [PROPOSED] ORDER

21 It is hereby stipulated by and between counsel for the United States and counsel for the
22 defendant Brogdan Vaduva, that time be excluded under the Speedy Trial Act from March 8, 2022
23 through April 18, 2022.

24 The government and counsel for the defendant agree that time be excluded under the Speedy
25 Trial Act so that defense counsel could continue to prepare, including by reviewing the discovery
26 already produced. The government has produced over 3,000 pages of discovery and the parties have
27 been in plea negotiations. Further, the government intends to produce another large batch of discovery
28 this week. For this reason, the parties stipulate and agree that excluding time until April 18, 2022 will
allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further
stipulate and agree that the ends of justice served by excluding the time from March 8, 2022 through

29 STIPULATION TO EXCLUDE TIME AND [PROPOSED] ORDER
30 Case No. 21-CR-00264

1 April 18, 2022, from computation under the Speedy Trial Act outweigh the best interests of the public
2 and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

3 The undersigned Assistant United States Attorney certifies that she has obtained approval from
4 counsel for the defendant to file this stipulation and proposed order.

5

6 IT IS SO STIPULATED.

7 DATED: February 28, 2022

/s/
ALEXIS JAMES
Assistant United States Attorney

9 DATED: February 28, 2022

/s/
DAVID BEITCHMAN
Counsel for Defendant Brogdon Vaduva

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ORDER

13 Based upon the facts set forth in the stipulation of the parties and for good cause shown, the
14 Court finds that failing to exclude the time from March 8, 2022 through April 18, 2022 would
15 unreasonably deny defense counsel and the defendant the reasonable time necessary for effective
16 preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The
17 Court further finds that the ends of justice served by excluding the time from March 8, 2022 to April 18,
18 2022 from computation under the Speedy Trial Act outweigh the best interests of the public and the
19 defendant in a speedy trial. Therefore, and with the consent of the parties, IT IS HEREBY ORDERED
20 that the time from March 8, 2022 through April 18, 2022 shall be excluded from computation under the
21 Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

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IT IS SO ORDERED.

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24 DATED: 3/3/2022


HON. JAMES DONATO
United States District Judge

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